

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN

**In Re: AUTOMOTIVE PARTS  
ANTIRUST LITIGATION**

Master File No.: 12-md-02311  
Honorable Marianne O. Battani

2:12-MD-02311-MOB-MKM

In Re: All Auto Parts Cases

**THIS DOCUMENT RELATES TO:  
ALL AUTO PARTS CASES**

**DECLARATION OF ADAM B. WOLFSON IN SUPPORT OF  
GENERAL MOTORS' OBJECTION TO SPECIAL MASTER'S  
ORDERS COMPELLING PRODUCTION OF CERTAIN  
CONFIDENTIAL COMMERCIAL, TRADE SECRET  
PRICING DOCUMENTS**

I, Adam Wolfson, declare as follows:

1. I am a partner at the law firm Quinn, Emanuel, Urquhart, & Sullivan LLP and I represent General Motors LLC, as well as its affiliated subpoenaed entities. I am authorized to practice law under the laws of New York and California.

2. I make this declaration in support of General Motors' Objection to Special Master's Orders Compelling Production of Certain Confidential Commercial, Trade Secret Pricing Documents.

3. [REDACTED]

[REDACTED]

[REDACTED]

4. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

5. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

6. Attached as Exhibit D is a true and correct copy of the OEMs'

[Proposed] Special Master's Order Regarding the Production of Certain Vehicle Pricing Information of Certain Non-Party Original Equipment Manufacturers and Their Affiliated Entities, which was submitted to Special Master Esshaki via email on December 20, 2016.

7. Attached as Exhibit E is a true and correct copy of the transcript of Motion Hearings held before Special Master Esshaki on December 9, 2016, which appears as Docket Entry 1572.

8. Attached as Exhibit F is a true and correct copy of the sealed version of The Parties' Notice of Motion and Renewed Motion to Compel Discovery from Certain Non-Party Original Equipment Manufacturers and their Affiliated Entities, which was originally filed under seal as Docket Entry 1500.

9. [REDACTED]

10. [REDACTED]

11. Attached as Exhibit I is a true and correct copy of the sealed version

of The Parties' Joint Reply to Certain Non-Parties' Oppositions to the Parties'  
Renewed Motion to Compel Discovery, which was originally filed under seal as  
Docket Entry 1549.

12. [REDACTED]  
[REDACTED]  
[REDACTED]

I certify under penalty of perjury under the laws of the United States of  
America that the foregoing is true and correct.

Executed this 12th day of January, 2017, at Washington, DC.

By: 

Adam B. Wolfson